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*Counsel for FedEx Supply Chain
Logistics & Electronics, Inc.*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 7
GOODMAN NETWORKS, INC.	§	Case No. 22-31641 (MVL)
Debtor.	§	Relates to Docket No. 452
	§	

**FSCLE'S LIMITED OBJECTION AND RESERVATION OF RIGHTS
TO THE FIRST INTERIM FEE APPLICATION OF MUNSCH HARDT KOPF & HARR, P.C.**

FedEx Supply Chain Logistics & Electronics, Inc. ("FSCLE") files this Limited Objection and Reservation of Rights to the *First Interim Fee Application of Munsch Hardt Kopf & Harr, P.C.* (the "Limited Objection" to the "Application") (ECF No. 452). FSCLE respectfully states the following:

1. Munsch applies for the interim allowance of fees in the amount of \$1,484,254.00 (the “Requested Fees”) and the interim reimbursement of expenses in the amount of \$79,795.92 (the “Requested Expenses”) and requests an interim distribution of \$700,000, which would be subject to disgorgement pending the final allowance of fees and expenses before this Court.

2. FSCLE recognizes that this is a complex chapter 7 case that involves gross mismanagement by the prepetition Debtor and fraud and theft by persons acting on behalf of the Debtor. FSCLE does not dispute that at least \$700,000 of the Requested Fees and Requested Expenses were reasonable and necessary to administer this Estate and should be allowed in the interim.

3. FSCLE files this Limited Objection and reserves its rights to dispute fees and expenses in excess of \$700,000 for future fee applications. FSCLE reserves the right to object to the fees sought in this Application at such time as future distributions are sought or upon final fee application.

4. FSCLE further objects to the Fee Application to the extent it seeks to use any proceeds of the AMRR settlements without FSCLE consent or after a determination of property rights by this Court.

5. FSCLE further objects to the Fee Application to the extent it seeks to use proceeds of the Prosperity Settlement absent a final resolution of that contested matter.

6. FSCLE incorporates its objection to the Trustee’s Cash Collateral Motion, ECF No. 452, but reiterates that the primary objection to that motion regards the summary determination of lien rights, the replacement lien, and the distribution to Bondholders.

Respectfully submitted,

BUTLER SNOW LLP

/s/ Adam M. Langley

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CERTIFICATE OF SERVICE

I, Adam M. Langley, certify that the foregoing pleading was filed electronically through the Court's ECF system and served electronically on all parties enlisted to receive service electronically in this case.

Dated: December 14, 2023

/s/ Adam M. Langley

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